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August 15, 2022

SENT VIA EMAIL: bailey.axe@phila.gov

Bailey Axe, Esquire
Deputy City Solicitor
City of Philadelphia – Law Department
1515 Arch Street, 14th Floor
Philadelphia, PA 19102

RE: Alfonse Bowman v. City of Philadelphia, et al.
No. 22-2037

Dear Ms. Axe:

Enclosed, please find Plaintiff's Request for Production of Documents, along with the Plaintiff's discovery disclosures in the above matter pursuant to Rule 26:

Medical Records

Bates No.

Abington Memorial Hospital - Medical Records	00001-00006
Abington Memorial Hospital - Medical Records from Ciox	00007-00034
Wills Eye Hospital - Medical Records	00035-00042

Video

Video 1	00043
Video 2	00044

Still Images

Stills from Video 1	00045-00494
Enhanced Stills from Video 1	00495-00944

We have a second incomplete set of the same photographs included in "Stills from Video 1." The set that we had did not include images 175-450 (Bates No. 00219-00494). We are providing you with a complete set of the still images extracted from the video ("Stills from

Exhibit 1

Video 1”). If you would like the incomplete set of the same exact images up to photograph 174 (Bates No. 00218), we are happy to provide that as well.

Finally, we have two eyewitnesses, Jordan Bradley and Emil Bradley.

Thank you for your attention to this matter.

Sincerely,

/s/ Paul J. Hetznecker

Paul J. Hetznecker

PJH/yjl
Enclosures